



Todd A. Spodek, Esq.
Direct Dial: (347) 292-8633
ts@spodeklawgroup.com

May 31, 2023

BY ECF:

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse - Courtroom 15C
500 Pearl St.
New York, NY 10007-1312

REQUEST GRANTED.

The Court approves the location restriction in
Ms. Siegel's bond be modified as proposed.

6/5/2023 SO ORDERED.

LEWIS J. LIMAN
United States District Judge

RE: United States v. Danielle Siegel
Case No.: 1:23-CR-00207-1 (LJL)
Letter Motion Requesting Modification of Conditions of Release

Dear Judge Liman:

Please be advised I represent **Danielle Siegel** in the above captioned action.

Ms. Siegel is currently subject to release conditions as per the April 20, 2023 appearance bond (ECF No.: 5). We had previously written to you on May 4, 2023 requesting additional time for Ms. Siegel to have her bond signed by financially responsible persons, which was granted (ECF Nos.: 7 and 8). Ms. Siegel's bond restricts her travel to the Southern and Eastern Districts of New York.

Ms. Siegel would like to move to 2491 Diamondback Trail, New Braunfels, TX 78130, together with her children.

We request that the location restriction in Ms. Siegel's bond be modified from limiting her travel to the Southern and Eastern Districts of New York: to permit Ms. Siegel to travel from her home to the Western District of Texas (the district where her new proposed address is located) and all points in between during the move; to restrict travel to the Western and Southern Districts of Texas; and to permit Ms. Siegel to travel to SDNY, as well as all points in between the Western District of Texas and the SDNY for court appearances and attorney client meetings.

I have spoken with AUSA Smyser regarding this request, and her office deferred to the judgment of Pretrial Services regarding the requested modification.

PTSO Andrew Berglind, of the Eastern District of New York, has no objection to the requested modification. PTSO Marlon Ovalles, of the Southern District of New York, has no objection to the requested modification.

The Honorable Lewis J. Liman
Page 2 of 2

If Your Honor has any questions, or concerns, I am available to address them. Please feel free to reach out to me by email, at ts@spodeklawgroup.com, or by phone at 347-292-8633.

Thank you in advance for your attention to this matter.

Sincerely,
Spodek Law Group P.C.
/s/ Todd A. Spodek
Todd A. Spodek

cc: AUSA Madison Reddick Smyser (By ECF).